

**From:** Betts, E. Windsor <EBetts@mcguirewoods.com>  
**Sent:** Thursday, November 17, 2022 8:04 PM  
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**Cc:** Oostdyk, Scott C.; Siegmund, Heidi E.; Church, Cory M.  
**Subject:** Lamb v. Liberty - Document Production

Counsel:

Within the next 30 minutes you will receive an email from McGuireWoods Sharefile from which you will be able to download documents with the following bates range: **LU003749 to LU005734**.

We do have some audio files to produce, but would like to discuss a confidentiality agreement to cover Personally Identifiable Information as the audio files are not as easily "redacted" and would likely require an outside vendor to make such "redactions." Additionally, a privilege log will be produced to you by December 15.

If you have any issues downloading the documents, please let me know.

Thank you,

Windsor

**E. Windsor Betts**

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